

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**
3

DANIEL VICTOR HANCOCK, an individual,

Plaintiff,

vs.

JIMMY LOVRIEN, an individual, DULUTH
NEWS TRIBUNE, LLC, a Minnesota Limited
Liability Company, and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:24-cv-369-CDS-NJK

PROPOSED ORDER

4
5 This matter came before the Court on the Motion of Jimmy Lovrien and Duluth News
6 Tribune, LLC to Dismiss for Lack of Personal Jurisdiction. Plaintiff Daniel Victor Hancock
7 has failed to respond to the motion as required by Local Rule LR 7-2(b). Under Local Rule LR
8 7-2, “[t]he failure of an opposing party to file points and authorities in response to any motion
9 . . . constitutes a consent to the granting of the motion.” **IT IS HEREBY ORDERED**, as
10 follows:

- 11 1. Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction is **GRANTED**.
12 2. Plaintiff Daniel Victor Hancock’s Complaint against Defendants Jimmy Lovrien and
13 Duluth News Tribune, LLC, is hereby **DISMISSED WITHOUT PREJUDICE**.
14
15 **LET JUDGMENT BE ENTERED ACCORDINGLY.**

16 Dated this ____ day of _____, 2024.

17
18 _____
19 Cristina D. Silva
20 Judge of the District Court

BRUNO WOLFENZON, ESQ.
 Nevada Bar No. 6177
 JONATHAN P. ROLLE, ESQ.
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 MICHAEL KUSTRA, ESQ.
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ATTORNEYS FOR DEFENDANTS
DULUTH NEWS TRIBUNE AND JIMMY LOVRIEN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL VICTOR HANCOCK, an
 individual,

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CERTIFICATION

CERTIFICATION

I, Jordan Weir, Esq. (*pro hac vice*), am counsel for defendants, Duluth News Tribune and Jimmy Lovrien in the above-referenced matter. I hereby certify that on July 12, 2024, I personally served, via email correspondence, a copy of the attached Proposed Order to Plaintiff, Daniel Victor Hancock's counsel, Rena McDonald, Esq., of Eclipse Law Group. A true and correct copy of said email correspondence is attached hereto as **Exhibit A – Proposed Order Email Correspondence**. More than three days after service have passed and no reasons for disapproval were received. Pursuant to LR7-2(f), such "failure to notify the prevailing party within three days of any reason for disapproval will be deemed an approval."

DATED this 19th day of July, 2024.

/s/ Jordan B. Weir
JORDAN B. WEIR
ND Bar# 07852 (*pro hac vice*)
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DULUTH NEWS TRIBUNE AND JIMMY
LOVRIEN**

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INDEX OF EXHIBITS

Exhibit A – Proposed Order Email Correspondence

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of WOLFENZON ROLLE, and hereby certify that on this 19th day of July, 2024, **PROPOSED ORDER and CERTIFICATION**, was filed and served via the United States District Court CM/ECF system on all parties or persons requiring notice.

RENA MCDONALD, ESQ.
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Attorneys for Defendants,
DULUTH NEWS TRIBUNE
and JIMMY LOVRIEN

/s/ Walter Monge
An employee of WOLFENZON ROLLE

EXHIBIT A –
PROPOSED ORDER EMAIL
CORRESPONDENCE

EXHIBIT A –
PROPOSED ORDER EMAIL
CORRESPONDENCE

From: [Jordan B. Weir](#)
To: rena@eclipselawgroup.com
Cc: [Tracy A. Ottum](#)
Subject: Proposed Order - Hancock v. Lovrien, et al.
Date: Friday, July 12, 2024 6:44:11 PM
Attachments: [\(Proposed\) Order Granting MTD for lack of PJ 4880-1206-7024.1.pdf](#)

Good evening:

In accordance with the Local Rules of Procedure, attached is a copy of a proposed order we intend to file with the Court.

Sincerely,

Jordan Weir

Get [Outlook for iOS](#)

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